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**Building The
Wireless Future™**

CTIA

Cellular
Telecommunications
Industry Association
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Randall S. Coleman
Vice President for
Regulatory Policy and Law

May 9, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Ex Parte Filing
Gen. Docket No. 90-314
Personal Communications Services

RECEIVED

MAY - 9 1994

Dear Mr. Caton:

On Monday, May 9, 1994, pursuant to the request of Mr. Gregory Rosston of the Commission's Office of Plan and Policy, the Cellular Telecommunications Industry Association (CTIA) delivered to Mr. Rosston a copy of the cover letter and related information attached hereto. The material presented sets forth the substance of the views expressed in connection with this matter.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and one copy of this letter and attachments are being filed with your office.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

Randall S. Coleman

Attachments

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



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Randall S. Coleman
Vice President for
Regulatory Policy and Law

May 9, 1994

Mr. Gregory Rosston
Telecommunications Specialist
Federal Communications Commission
Office of Plans and Policy
1919 M Street, N.W. - Room 822
Washington, D.C. 20554

RE: Personal Communications Services - Docket No. 90-314

Dear Mr. Rosston:

In response to your query, attached is a chart sorting ownership interests in the top 100 cellular markets by percentage baskets. To summarize, in the top 100 cellular markets:

- 111 licensees hold interests between 91-100 percent.
- 26 licensees hold interests between 81-90 percent.
- 14 licensees hold interests between 71-80 percent.
- 10 licensees hold interests between 61-70 percent.
- 25 licensees hold interests between 51-60 percent.
- There are also 15 licenses which are split evenly by partners.

However, *minority interests are more relevant to the issue of the defects of the current attribution/ownership rules* -- which provide that 5 percent is an attributable interest, and that 20 percent converts an investor into a "cellular carrier," making it subject to the 10 percent population overlap rule.

In the top 100 markets, 31 minority partners would be restricted as if they were majority partners, as they hold interests between 20 percent and 40 percent. Another 11 players have interests between 41 and 49 percent in the top 100 markets. (Another 28 companies evenly split partnership interests of 50/50 or 45/45.) A further 33 minority partners are likely to be restricted as they hold interests between 10 percent and 19 percent, and are apt to be handicapped if they partner with other investors already active in wireless services in their geographic region.

Letter to Mr. Gregory Rosston
May 9, 1994
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Thus, a total of 75 minority partners are likely to be impacted by the attribution rules, while another 12 minority partners have attributable interests which can be used for calculating interests.

CTIA's proposal that the ownership attribution rules be amended to raise the attribution threshold to 40 percent will provide greater opportunities for these minority shareholders to participate. In the top 100 markets, at least 64 minority cellular shareholders could participate as full players in PCS if CTIA's proposal is adopted.

If you have any questions about the foregoing, please contact the undersigned.

Very truly yours,



Randall S. Coleman

Attachment

Minority Partnership Baskets and the Attribution Rules

Rank By Market Pops	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
1 - New York 14.9 million		Bell Atlantic			Sprint
2 - Los Angeles 14.6 million		LIN		Contel	U.S. Cellular@
3 - Chicago 7.5 million					Sprint@
4 - Philadelphia 4.9 million	LIN				
5 - Detroit 4.6 million	CCI & AirTouch*				
6 - Dallas 4.2 million			McCaw	GTE AirTouch	
7 - Boston 4.0 million					
8 - Houston 3.8 million	BellSouth				Sprint@
9 - San Francisco 3.8 million	AirTouch			Contel	
10 - Washington 3.8 million		Contel			
11 - Miami 3.3 million					
12 - Atlanta 2.9 million					
13 - San Diego 2.6 million					
14 - Minneapolis 2.6 million			Contel		
15 - St. Louis 2.5 million				McCaw	
16 - Baltimore 2.4 million					
17 - Phoenix 2.2 million					
18 - Pittsburgh 2.1 million		SWB			

	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
19 - Seattle 2.1 million				GTE	U.S. Cellular@
20 - Tampa 2.0 million					
21 - San Juan 2.0 million					
22 - Denver 2.0 million					
23 - Cleveland 1.8 million	CCI & AirTouch*				
24 - Portland 1.5 million					U S WEST@
25 - San Jose 1.5 million	PacTel & McCaw*			Contel	
26 - Cincinnati 1.5 million	CCI & AirTouch*, Cincinnati Bell				
27 - Kansas City 1.5 million	CCI & AirTouch*			Sprint	
28 - Sacramento 1.5 million	AirTouch		Roseville, Centennial		AirTouch
29 - Milwaukee 1.4 million				Nor'west	
30 - San Antonio 1.3 million			Contel		
31 - Indianapolis 1.3 million			Ameritech		
32 - Columbus 1.3 million	CCI & AirTouch*, Cincinnati Bell				
33 - Buffalo 1.2 million	NYNEX & Rochester*		McCaw		
34 - Salt Lake 1.2 million					
35 - New Orleans 1.2 million					
36 - Orlando 1.2 million				Sprint	

	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
37 - Hartford 1.1 million				NYNEX	
38 - Nashville 1.0 million	U.S. Cellular				
39 - Rochester 1.0 million	NYNEX & Rochester*			Kacol ALLTEL	
40 - Memphis 1.0 million			Millington		
41 - Norfolk 1.0 million					
42 - Jacksonville 1.0 million				Contel	
43 - Oklahoma Cty 1.0 million			Chickasaw Tel.	U.S. Cellular	
44 - Greensboro 1.0 million				Northern State, BellSouth	
45 - Louisville 0.9 million					
46 - West Palm B. 0.9 million					
47 - Providence 0.9 million					
48 - Las Vegas 0.9 million			AirTouch		
49 - Birmingham 0.9 million					
50 - Honolulu 0.9 million			RAM Brdcstg		
51 - Dayton 0.9 million	CCI & AirTouch*, Cincinnati Bell				
52 - Austin 0.9 million		Century			
53 - Albany 0.9 million					
54 - Bridgeport 0.8 million				NYNEX	

	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
55 - Charlotte 0.8 million					
56 - New Haven 0.8 million				NYNEX	
57 - Toledo 0.8 million	CCI & AirTouch*			Ameritech	
58 - Tulsa 0.8 million	Independent Cellular				
59 - Richmond 0.8 million			Sprint		
60 - Raleigh 0.8 million					
61 - Fresno 0.7 million					GTE
62 - Grand Rapids 0.7 million	CCI & AirTouch*				
63 - Allentown 0.7 million				Sprint	
64 - Worcester 0.7 million					
65 - Oxnard 0.7 million				Contel	U.S. Cellular
66 - Tucson 0.7 million				Arizona Tel.	AirTouch
67 - New Brunswk. 0.7 million		Bell Atlantic			Sprint
68 - Syracuse 0.7 million	ALLTEL		NYNEX & Rochester**		
69 - Akron 0.7 million	CCI & AirTouch*				
70 - Greenville 0.7 million				Contel	
71 - NE Penn. 0.7 million				PENCOR	
72 - El Paso 0.6 million					
73 - Tacoma 0.6 million				GTE	U.S. Cellular

	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
74 - Omaha 0.6 million			Sprint, Lincoln		
75 - Gary 0.6 million		BellSouth			Sprint
76 - Bakersfield 0.6 million					GTE
77 - Springfield 0.6 million				NYNEX	
78 - Wilmington 0.6 million					
79 - Albuquerque 0.6 million	Contel				
80 - Long Branch 0.6 million		Bell Atlantic			
81 - Baton Rouge 0.6 million	BellSouth				
82 - Charleston 0.5 million					
83 - Knoxville 0.5 million					
84 - Little Rock 0.5 million		Century			
85 - Stockton 0.5 million			Roseville, Centennial		
86 - New Bedford 0.5 million					
87 - Flint 0.5 million	CCI & AirTouch*				
88 - Mobile 0.5 million					
89 - Lansing 0.5 million	CCI & AirTouch*				
90 - Youngstown 0.5 million					
91 - Vallejo 0.5 million	McCaw & AirTouch*			Contel	
92 - Harrisburg 0.5 million				Comcast	

	50 - 41	40 - 31	30 - 21	20 - 11	10 - 5@
93 - Columbia 0.5 million				ALLTEL	
94 - Wichita 0.5 million		ALLTEL			
95 - Newport News 0.5 million					
96 - Johnson City 0.4 million					
97 - Chattanooga 0.4 million			Cellular Radio of Chattanooga	ALLTEL	
98 - Lancaster 0.4 million					
99 - York 0.4 million					
100 - Melbourne 0.4 million				Sprint	
TOTAL	42	10	19	32	14

NOTE: Pops based on Donaldson, Lufkin & Jenrette estimates in *The Wireless Communications Industry, Winter 1994*.

@ Shares clearly qualifying for attribution of ownership interest.

* 50/50 joint ventures

** 42.50 & 45.00 joint ventures

Majority Ownership Interests and Pops

Rank by Market Pops	100 - 91	90 - 81	80 - 71	70 - 61	60 - 50
1 - New York 14.9 million	LIN				NYNEX
2 - Los Angeles 14.6 million		AirTouch			BellSouth
3 - Chicago 7.5 million	S.W. Bell Ameritech				
4 - Philadelphia 4.9 million	Bell Atlantic				Comcast
5 - Detroit 4.6 million	Ameritech				CCI/AirTouch*
6 - Dallas 4.2 million	S.W. Bell				LIN
7 - Boston 4 million	S.W. Bell NYNEX				
8 - Houston 3.8 million			GTE		LIN
9 - San Francisco 3.8 million		GTE			McCaw
10 - Washington 3.8 million	S.W. Bell			Bell Atlantic	
11 - Miami 3.3 million	McCaw BellSouth				
12 - Atlanta 2.9 million	AirTouch BellSouth				
13 - San Diego 2.6 million	U S WEST AirTouch				
14 - Minneapolis 2.6 million	McCaw			U S WEST	
15 - St. Louis 2.5 million	S.W. Bell	Ameritech			
16 - Baltimore 2.4 million	S.W. Bell BellAtlantic				
17 - Phoenix 2.2 million	Bell Atlantic U S WEST				
18 - Pittsburgh 2.1 million	Bell Atlantic			McCaw	

	100 - 91	90 - 81	80 - 71	70 - 61	60 - 50
19 - Seattle 2.1 million	McCaw		U S WEST		
20 - Tampa 2.0 million	McCaw GTE				
21 - San Juan 2 million	CCI of Pr. Puerto Tel.				
22 - Denver 2 million	McCaw U S WEST				
23 - Cleveland 1.8 million	GTE				CCI/AirTouch*
24 - Portland 1.5 million	McCaw	GTE			
25 - San Jose 1.5 million		GTE			McCaw
26 - Cincinnati 1.5 million					CCI/AirTouch* Ameritech
27 - Kansas City 1.5 million			S.W. Bell		CCI/AirTouch* McCaw
28 - Sacramento 1.5 million	McCaw				AirTouch
29 - Milwaukee 1.5 million	BellSouth		Ameritech		
30 - San Antonio 1.4 million	McCaw			S.W. Bell	
31 - Indianapolis 1.3 million	BellSouth			GTE	
32 - Columbus 1.3 million					CCI/AirTouch* Ameritech
33 - Buffalo 1.2 million			Assoc. Comm.		NYNEX/Rochester*
34 - Salt Lake 1.2 million	McCaw U S WEST				
35 - New Orleans 1.2 million	Radiofone BellSouth				
36 - Orlando 1.2 million	McCaw	BellSouth			
37 - Hartford 1.1 million	Bell Atlantic	S. New Eng.			

	100 - 91	90 - 81	80 - 71	70 - 61	60 - 50
38 - Nashville 1.0 million	Contel				BellSouth
39 - Rochester 1.0 million		Assoc. Comm.			NYNEX/Rochester**
40 - Memphis 1.0 million	Contel		BellSouth		
41 - Norfolk 1.0 million	Sprint Contel				
42 - Jacksonville 1.0 million	McCaw	BellSouth			
43 - Oklahoma Cty 1.0 million	McCaw			S.W. Bell	
44 - Greensboro 1.0 million	GTE			Sprint	
45 - Louisville 0.9 million	Contel BellSouth				
46 - West Palm B. 0.9 million	McCaw BellSouth				
47 - Providence 0.9 million	Bell Atlantic NYNEX				
48 - Las Vegas 0.9 million	McCaw		Sprint		
49 - Birmingham 0.9 million	Contel BellSouth				
50 - Honolulu 0.9 million	GTE		BellSouth		
51 - Dayton 0.9 million					CCI/AirTouch* Ameritech
52 - Austin 0.9 million	McCaw				GTE
53 - Albany 0.8 million	Assoc. Comm. NYNEX				
54 - Bridgeport 0.8 million	Bell Atlantic	S. New Eng.			
55 - Charlotte 0.8 million	Bell Atlantic ALLTEL				
56 - New Haven 0.8 million	Bell Atlantic	S. New Eng.			

	100 - 91	90 - 81	80 - 71	71 - 60	60 - 50
57 - Toledo 0.8 million			Sprint		CCI/AirTouch*
58 - Tulsa 0.8 million	McCaw				U.S. Cellular
59 - Richmond 0.8 million	Contel		BellSouth		
60 - Raleigh 0.8 million	GTE	Sprint			
61 - Fresno 0.7 million	McCaw Contel				
62 - Grand Rapids 0.7 million	Century				CCI/AirTouch*
63 - Allentown 0.7 million	Vanguard				Bell Atlantic
64 - Worchester 0.7 million	NYNEX	S.W. Bell			
65 - Oxnard 0.7 million	McCaw				AirTouch
66 - Tucson 0.7 million		Bell Atlantic		U S WEST	
67 - New Brunswk. 0.7 million	Comcast				NYNEX
68 - Syracuse 0.7 million	S.W. Bell				NYNEX/ALLTEL**
69 - Akron 0.7 million	GTE				CCI/AirTouch*
70 - Greenville 0.7 million	Bell Atlantic	Sprint			
71 - NE Penn. 0.7 million	Vanguard		C-TEC		
72 - El Paso 0.6 million	Bell Atlantic Contel				
73 - Tacoma 0.6 million	McCaw		U S WEST		
74 - Omaha 0.6 million	U S WEST				Lincoln Tel.
75 - Gary 0.6 million	Ameritech			S.W. Bell	

	100 - 91	90 - 81	80 - 71	70 - 61	60 - 50
76 - Bakersfield 0.6 million	BellSouth Contel				
77 - Springfield 0.6 million	Bell Atlantic	S. New Eng.			
78 - Wilmington 0.6 million	Comcast Bell Atlantic				
79 - Albuquerque 0.6 million	Bell Atlantic				U S WEST
80 - Long Branch 0.6 million	Comcast				NYNEX
81 - Baton Rouge 0.6 million		Radiofone			U.S. Cellular
82 - Charleston 0.5 million	GTE		Sprint		
83 - Knoxville 0.5 million	Contel U.S. Cellular				
84 - Little Rock 0.5 million		McCaw		ALLTEL	
85 - Stockton 0.5 million	McCaw				AirTouch
86 - New Bedford 0.5 million	Bell Atlantic NYNEX				
87 - Flint 0.5 million		Ameritech			CCI/AirTouch*
88 - Mobile 0.5 million	BellSouth Contel				
89 - Lansing 0.5 million	Century				CCI/AirTouch*
90 - Youngstown 0.5 million	Youngstown		Sprint		
91 - Vallejo 0.5 million		GTE			McCaw/AirTouch*
92 - Harrisburg 0.5 million		Vanguard Sprint			
93 - Columbia 0.5 million	Bell Atlantic	BellSouth			
94 - Wichita 0.5 million	AirTouch				S.W. Bell

	100 - 91	90 - 81	80 - 71	70 - 61	60 - 50
95 - Newport News 0.5 million	Sprint Contel				
96 - Johnson City 0.4 million	Contel Sprint				
97 - Chattanooga 0.4 million	Contel				BellSouth
98 - Lancaster 0.4 million	Vanguard	Sprint			
99 - York 0.4 million	Vanguard	Sprint			
100 - Melbourne 0.4 million	McCaw	BellSouth			
TOTAL	111	26	14	10	39

NOTE: Pops based on Donaldson, Lufkin & Jenrette estimates in *The Wireless Communications Industry, Winter 1994*.

* 50/50 joint ventures

** 42.50 & 45.00 joint ventures